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April 21, 2011

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Re: Transmittal of Comments on Proposed Coast Guard VCS Rule
Docket USCG-1999-5150

Dear Sir or Madam:

Stolt Barge Services (SBS) operates a tank barge cleaning facility in Channelview, TX, and thus is directly affected by the Coast Guard's Vapor Control System (VCS) proposed rulemaking. We appreciate the opportunity to comment on the proposed rule, which was published in the October 21, 2010, *Federal Register*. Our comments are as follows.

By elevating barge cleaning requirements to the same purview as barge loading, the proposed VCS requirements would require barge cleaning facilities to obtain approval for each individual compound if we want or need to use the flare to control the cleaning operations for a new chemical. This type of review is costly and time-consuming for cleaning facilities such as SBS, and it will greatly limit our flexibility regarding our ability to clean new cargoes that arrive. There is not adequate lead-time to identify a new chemical enough in advance of its arrival to prepare such documentation and obtain USCG's approval to flare the vapors from the cleaning of that compound.

Barge cleaning is unlike many barge loading terminals, which are located at facilities dedicated to loading specific chemicals. One of our biggest assets to our customers is our ability to respond rapidly to their needs and clean newly identified cargoes. We are very concerned that the required review of new flared cargoes by the USCG could cause considerable delays and negatively impact our business.

SBS would need to hire an engineering company to prepare the appropriate documentation for each new compound, and, depending on their availability and schedule, it could take a significant amount of time, as could the review by USCG. This would greatly limit SBS's ability to add new chemicals to our cleaning list. We would like to request that a one-time review be conducted for cleaning facilities, not a review for every cleaned cargo, since the cargo concentration in the vapors subsequent to the onset of cleaning should be considerably reduced compared to vapor generated during barge filling with a pure chemical. This

documentation could consist of a review of certain types of categories of compounds to reduce the requirement for subsequent reviews.

In addition, SBS is also very concerned about the new costs that will be incurred by the extensive details proposed to be required in the VCS operations manual, as well as the periodic operational reviews. We would like to request that the operational reviews be required no more often than every 5 years, since we believe USCG's estimated cost of \$5,000 to be optimistic.

Again, thank you for the opportunity to comment on this proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Ameen", is displayed on a light gray rectangular background.

Brian Ameen
Environmental Affairs Superintendent